

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DR. DAVID SIMAI,
on behalf of Plaintiff and the class defined herein,

Plaintiff,

v.

CO-OPTIONS INC., d/b/a
THE SAMPLING STORE;
KRAFT HEINZ FOODS COMPANY;
KRAFT FOODS GROUP BRANDS LLC;
and JOHN DOES 1-10,

Defendants.

COMPLAINT – CLASS ACTION

INTRODUCTION

1. Plaintiff Dr. David Simai brings this action to secure redress for the actions of Defendants Co-options Inc., d/b/a the Sampling Store; Kraft Heinz Foods Company; Kraft Foods Group Brands LLC; and John Does 1-10, in sending or causing the sending of unsolicited advertisements to telephone facsimile machines in violation of the Telephone Consumer Protection Act, 47 U.S.C. §227 (“TCPA”).

2. The TCPA expressly prohibits unsolicited fax advertising. Unsolicited fax advertising damages the recipients. The recipient is deprived of its paper and ink or toner and the use of its fax machine. The recipient also wastes valuable time it would have spent on something else. Unsolicited faxes prevent fax machines from receiving and sending authorized faxes, cause wear and tear on fax machines, and require labor to attempt to identify the source and purpose of the unsolicited faxes.

PARTIES

3. Plaintiff Dr. David Simai has offices in the Eastern District of New York, where

he maintains telephone facsimile equipment that automatically prints incoming faxes on paper using toner/ ink.

4. Defendant Co-Options Inc., d/b/a The Sampling Store, is a corporation organized under the law of Connecticut with its principal office at 120A North Salem Street, Apex, NC 27502. It also has offices at 321 Glen Echo Lane, Suite C, Cary, NC 27518.

5. Defendant Co-Options Inc., d/b/a The Sampling Store, contracts with major manufacturers of food and similar products to distribute samples of such products, for the purpose of introducing them to the market and inducing consumers to purchase them.

6. The organizations with which Defendant Co-Options Inc., d/b/a The Sampling Store, contracts include Defendant Kraft Heinz Foods Company and/or Defendant Kraft Goods Group Brands LLC.

7. Defendant Kraft Heinz Foods Company is a limited liability company organized under the law of Pennsylvania with principal offices at 1 PPG Place, Suite 3400, Pittsburgh, PA 15222. It does business in New York. Its registered agent and office is C T Corporation System, 28 Liberty St., New York, New York, 10005.

8. Defendant Kraft Foods Group Brands LLC is a limited liability company organized under the law of Delaware with principal offices at 1 PPG Place, Suite 3400, Pittsburgh, PA 15222. It does business in New York. Its registered agent and office is C T Corporation System, 28 Liberty St., New York, New York, 10005.

9. John Does 1-10 are other natural or artificial persons that were involved in the sending of the facsimile advertisements described below. Plaintiff does not know who they are.

JURISDICTION AND VENUE

10. This Court has jurisdiction under 28 U.S.C. §1331. *Mims v. Arrow Financial Services, LLC*, 565 U.S. 368, 132 S. Ct. 740, 751-53 (2012).

11. Personal jurisdiction exists in that Defendants have committed tortious acts in New York by causing the transmission of unlawful communications into the state.

12. Venue in this District is proper for the same reason.

FACTS

13. On July 20, 2020, Dr. David Simai received the unsolicited fax attached as Exhibit A on his facsimile machine.

14. On July 27, 2020, Dr. David Simai received the unsolicited fax attached as Exhibit B on his facsimile machine.

15. Plaintiff is a doctor who has offices in the Eastern District of New York where he sees and treats patients on a regular basis.

16. Discovery may reveal the transmission of additional faxes as well.

17. The faxes were sent by or at the direction of Defendant Co-Options Inc. on behalf of Defendant Kraft Heinz Foods Company and/or Kraft Foods Group Brands LLC.

18. Kraft Heinz Foods Company is the principal operating subsidiary of The Kraft Heinz Company, a public company. Kraft Heinz Foods Company has overall responsibility for the development and marketing of the company's food and beverage products, including the Creative Roots product.

19. Defendant Kraft Foods Group Brands LLC is the subsidiary of Kraft Heinz Foods Company which it holds out as responsible for the Creative Roots products. (Exhibit C)

20. Defendant Kraft Foods Group Brands LLC is the entity to which the website www.drinkcreativeroots.com (Exhibit C) is registered.

21. Kraft Foods Group Brands LLC and/ or Kraft Heinz Foods Company engaged Co-Options Inc. to distribute over 300,000 child-sized bottles of Creative Roots products to parents and caretakers of children via pediatricians and other practitioners.

22. The faxes attempt to induce the recipients to obtain and offer free samples of the new Creative Roots products for the purpose of inducing consumers to purchase them. "Kraft Heinz Foods' purpose in providing this program to you is to get the word out on its new Creative

Roots and provide parents and their kids with a chance to try them.” The samples are distributed through pediatricians and other physicians so that they would recommend the products as healthy.

23. Exhibits A-B inform the recipient of products that are commercially available (see Exhibit D) and seeks to have the recipient distribute and recommend those products, as part of an overall marketing plan to sell the Creative Roots products.

24. The faxes do not contain information on how to opt out of further faxes.

25. Defendants either negligently or wilfully violated the rights of Plaintiff and other recipients in sending the faxes.

26. Plaintiff had no prior relationship with Co-Options Inc. and had not authorized the sending of fax advertisements to Plaintiff.

27. On information and belief, the faxes attached hereto were sent as part of a mass broadcasting of faxes.

28. The TCPA makes unlawful the “use of any telephone facsimile machine, computer or other device to send an unsolicited advertisement to a telephone facsimile machine ...” 47 U.S.C. §227(b)(1)(C).

29. On information and belief, Defendants have transmitted similar unsolicited fax advertisements to at least 40 other persons in New York and others elsewhere.

30. There is no reasonable means for Plaintiff or other recipients of Defendants’ unsolicited advertising faxes to avoid receiving illegal faxes. Particularly in the medical field, where fax machines are used for the secure transmission of confidential patient information, fax machines must be left on and ready to receive the urgent communications authorized by their owners.

31. Defendants’ conduct caused recipients of their advertising to bear the cost thereof. This gave Defendants an unfair competitive advantage over businesses that advertise lawfully, such as by direct mail. For example, an advertising campaign targeting one million recipients would cost \$500,000 if sent by U.S. mail but only \$20,000 if done by fax broadcasting. The reason is that instead of spending \$480,000 on printing and mailing his ad, the fax broadcaster misappropriates the

recipients' paper and ink. "Receiving a junk fax is like getting junk mail with the postage due".

Remarks of Cong. Edward Markey, 135 Cong Rec E 2549, Tuesday, July 18, 1989, 101st Cong. 1st Sess.

COUNT I – TCPA

32. Plaintiff incorporates ¶¶ 1-31.

33. The TCPA makes unlawful the "use of any telephone facsimile machine, computer or other device to send an unsolicited advertisement to a telephone facsimile machine ..." 47 U.S.C. §227(b)(1)(c).

34. The TCPA, 47 U.S.C. §227(b)(3), provides:

Private right of action.

A person or entity may, if otherwise permitted by the laws or rules of court of a State, bring in an appropriate court of that State—

(A) an action based on a violation of this subsection or the regulations prescribed under this subsection to enjoin such violation,

(B) an action to recover for actual monetary loss from such a violation, or to receive \$500 in damages for each such violation, whichever is greater, or

(C) both such actions.

If the Court finds that the defendant willfully or knowingly violated this subsection or the regulations prescribed under this subsection, the court may, in its discretion, increase the amount of the award to an amount equal to not more than 3 times the amount available under the subparagraph (B) of this paragraph.

35. Plaintiff and each class member suffered damages as a result of receipt of the unsolicited faxes, in the form of time, paper and ink or toner consumed as a result. Furthermore, Plaintiff's statutory right of privacy was invaded.

36. Plaintiff and each class member is entitled to statutory damages.

37. Defendants violated the TCPA even if their actions were only negligent.

38. Defendants should be enjoined from committing similar violations in the future.

CLASS ALLEGATIONS

39. Pursuant to Fed.R.Civ.P. 23(a) and (b)(3), Plaintiff brings this claim on behalf of a class, consisting of (a) all persons (b) who, on or after a date four years prior to the filing of this action (28 U.S.C. §1658), (c) were sent faxes by or on behalf of Defendant Co-Options Inc., (d) promoting commercially available goods or services (d) where Defendants do not have evidence of consent or an established business relationship prior to the sending of the faxes. Plaintiff also defines a subclass, consisting of class members sent a fax on behalf of the Kraft Defendants.

40. The class is so numerous that joinder of all members is impractical. Plaintiff alleges on information and belief, based on the generic nature of the fax, that there are more than 40 members of the class.

41. There are questions of law and fact common to the class that predominate over any questions affecting only individual class members. The predominant common questions include:

- a. Whether Defendants engaged in a pattern of sending unsolicited faxes;
- b. Whether the faxes are advertisements;
- c. The manner in which Defendants compiled or obtained the list of fax numbers;
- d. Whether Defendants thereby violated the TCPA;
- e. The responsibility and involvement of each Defendant.

42. Plaintiff will fairly and adequately protect the interests of the class. Plaintiff has retained counsel experienced in handling class actions and claims involving unlawful business practices. Neither Plaintiff nor Plaintiff's counsel have any interests which might cause them not to vigorously pursue this action.

43. Plaintiff's claims are typical of the claims of the class members. All are based on the same factual and legal theories.

44. A class action is the superior method for the fair and efficient adjudication of this

controversy. The interest of class members in individually controlling the prosecution of separate claims against Defendants is small because it is not economically feasible to bring individual actions.

45. Numerous courts have certified class actions under the TCPA. *Holtzman v. Turza*, 08cv2014, 2009 WL 3334909, 2009 U.S. Dist. LEXIS 95620 (N.D.Ill. Oct. 14, 2009), *aff'd in part, rev'd in part, vacated in part*, 728 F.3d 682 (7th Cir. 2013); *Ballard RN Center, Inc. v. Kohl's Pharmacy and Homecare, Inc.* 2015 IL 118644, 48 N.E.3d 1060; *American Copper & Brass, Inc. v. Lake City Indus. Products, Inc.*, 757 F.3d 540, 544 (6th Cir. 2014); *In re Sandusky Wellness Center, LLC*, 570 Fed.Appx. 437, 437 (6th Cir. 2014); *Sandusky Wellness Center, LLC v. Medtox Scientific, Inc.*, 821 F.3d 992, 998 (8th Cir. 2016); *Sadowski v. Med1 Online, LLC*, 07cv2973, 2008 WL 2224892, 2008 U.S. Dist. LEXIS 41766 (N.D.Ill. May 27, 2008); *CE Design Ltd. v. Cy's Crabhouse North, Inc.*, 259 F.R.D. 135 (N.D.Ill. 2009); *Targin Sign Systems, Inc. v. Preferred Chiropractic Center, Ltd.*, 679 F.Supp.2d 894 (N.D.Ill. 2010); *Garrett v. Ragle Dental Laboratory, Inc.*, 10cv1315, 2010 WL 4074379, 2010 U.S. Dist. LEXIS 108339 (N.D.Ill. Oct. 12, 2010); *Hinman v. Mc&M Rental Center, Inc.*, 545 F.Supp.2d 802 (N.D.Ill. 2008); *G.M. Sign, Inc. v. Group C Communications, Inc.*, 08cv4521, 2010 WL 744262, 2010 U.S. Dist. LEXIS 17843 (N.D.Ill. Feb. 25, 2010); *Kavu, Inc. v. Omnipak Corp.*, 246 F.R.D. 642 (W.D.Wash. 2007); *Display South, Inc. v. Express Computer Supply, Inc.*, 961 So.2d 451, 455 (La.App. 2007); *Display South, Inc. v. Graphics House Sports Promotions, Inc.*, 992 So.2d 510 (La.App. 2008); *Lampkin v. GGH, Inc.*, 146 P.3d 847 (Ok.App. 2006); *ESI Ergonomic Solutions, LLC v. United Artists Theatre Circuit, Inc.*, 203 Ariz. 94, 50 P.3d 844 (2002); *Core Funding Group, LLC v. Young*, 792 N.E.2d 547 (Ind.App. 2003); *Critchfield Physical Therapy v. Taranto Group, Inc.*, 293 Kan. 285, 263 P.3d 767 (2011); *Karen S. Little, L.L.C. v. Drury Inns, Inc.*, 306 S.W.3d 577 (Mo.App. 2010); *Lindsay Transmission, LLC v. Office Depot, Inc.*, 4:12cv221, 2013 WL 275568, 2013 U.S. Dist. LEXIS 9554 (E.D.Mo. Feb. 24, 2013).

46. Management of this class action is likely to present significantly fewer difficulties than those presented in many class actions, e.g. for securities fraud.

WHEREFORE, Plaintiff requests that the Court enter judgment in favor of Plaintiff and the class and against Defendants for:

- a. Actual damages;
- b. Statutory damages;
- c. An injunction against the further transmission of unsolicited fax advertising;
- d. Costs of suit;
- e. Such other or further relief as the Court deems just and proper.

/s/ Adam J. Fishbein
Adam J. Fishbein

Adam J. Fishbein
ADAM J. FISHBEIN, P.C.
735 Central Avenue
Woodmere, New York 11598
(516) 668-6945
fishbeinadamj@gmail.com

pro hac vice admission to be sought:

Daniel A. Edelman (IL 0712094)
Dulijaza (Julie) Clark (IL 6273353)
EDELMAN, COMBS, LATTURNER & GOODWIN, LLC
20 South Clark Street, Suite 1500
Chicago, IL 60603-1824
(312) 739-4200
(312) 419-0379 (FAX)
Email address for service: courtecl@edcombs.com

NOTICE OF ASSIGNMENT

Please be advised that all rights relating to attorney's fees have been assigned to counsel.

/s/ Adam J. Fishbein
Adam J. Fishbein

EXHIBIT A



ATT: Eva Allen, MD or Pediatric Practice / Clinic Office Manager:

We are contacting you from Access Health on behalf of our client, **KRAFT HEINZ FOODS**, makers of new **CREATIVE ROOTS** plant-powered beverages for kids, to participate in a **FREE sampling program** at your pediatric practice / facility. Pediatrician practice and clinic response was so overwhelmingly positive that our 160,000 samples were all allocated last week for the initial program, but based on this enthusiasm, Kraft Foods just authorized a **second round of 160,000 samples** to start shipping during the third week of August. So, we are pleased to invite you to join hundreds of other Pediatric practices and clinics in this wonderful program.

According to the American Journal of Public Health and the Harvard School of Public Health, **1 in 2 kids is underhydrated.** With an expected record-breaking hot August and kids going back to school (or studying remotely), moms will love **CREATIVE ROOTS** to give their kids the plant-powered hydration they need with **only 1g of sugar, clinically shown to increase hydration levels in children.** Samples are actual kid-sized 8.5 oz. plastic mini-bottles.

You may remember us, CoOptions Health & Wellness, from our multiple Disney gummy vitamins promotions in the past and we hope to have you opt into this new program below. In Early August, we will be shipping the following to each participating office **at absolutely NO COST**:

- Minimum of three small cartons (108 total samples in a variety of flavors), up to 12 cartons (432 samples).
- A counter sign with a 50-sheet tear pad to invite parents to share their product opinion in an opt-in online survey (for a \$10 Amazon eGift card thank you reward), plus a \$2.00 coupon on the back of the tear sheet.

We will send a second shipment of a minimum of 108 samples (up to 432 samples) two weeks after the first shipment, knowing that space is often limited at facilities. Prior to shipping, we are following **strict packing and product handling safety protocols**.

If you would like your practice / facility to participate in this program, simply **VISIT** our opt-in portal at **www.CreativeRootsOptin.com** **OR** complete and **FAX back this form to 919-303-3225** (no cover sheet required). Please respond by **FRIDAY, July 31st**, but we recommend earlier to ensure that sample allocations are still available.

As with all our free **ACCESS HEALTH** sampling programs, these promotions are funded 100% by our clients and provided to physicians around the country at no cost and without other obligations. Kraft Heinz Foods' purpose in providing this program to you is **to get the word out on its new Creative Roots and provide parents and their kids with a chance to try them**. Should you have any questions about the program, please feel free to contact me at (919) 303-3223 or blanger@cooptions.com.

Best Regards,

Brad Langer, Program Manager

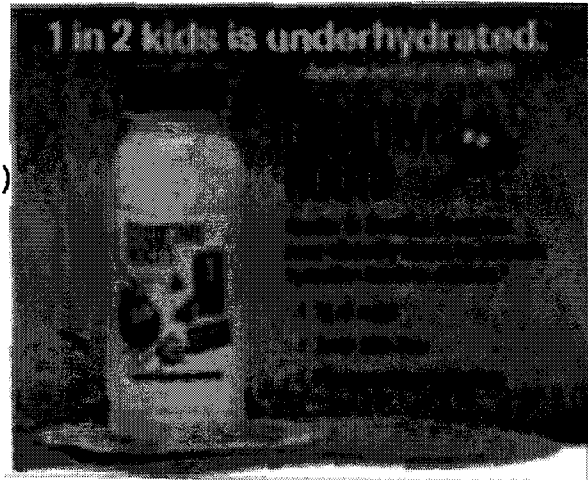
1 Harvard School of Public Health article: <https://www.hsph.harvard.edu/news/press-releases/study-finds-inadequate-hydration-among-u-s-children/>, Kenney E, et al. Prevalence of Inadequate Hydration Among US Children and Disparities by Gender and Race/Ethnicity: National Health and Nutrition Examination Survey, 2009-2012. *Am J Public Health*. 2015;105:e113-e118. 2 Dr. Douglas Cusa, "Nutrition, Urinary Markers and Sleep Habits in Children"



- ☐ **YES!** Please send me the free samples
☐ **NO,** please do not ship me the free samples

By completing this form, you will receive the following Creative Roots FREE product samples and signage:

- 3 to 12 small cartons (108 to 432 samples) in mid-August and again in late August (216 to 864 total samples), choose below
- 1 Counter sign per case per shipment with 50 tear pad with \$2.00 coupon



Please choose the number of samples that you would like to request below (please Select one of the following):

- ☐ Please ship 3 Cartons X 2 shipments (216 total samples)
☐ Please ship 6 Cartons X 2 shipments (432 total samples)
☐ Please ship 9 Cartons X 2 shipments (648 total samples)
☐ Please ship 12 Cartons X 2 shipments (864 total samples)

Receiving Contact Name: _____
 Practice / Facility: _____
 Street Address (NO PO BOXES): _____
 Floor, Building, Suite, etc. (if applicable): _____
 City/Town: _____
 State: _____
 Zip: _____

I agree on behalf of my facility to only distribute samples to parents and adult caretakers.

- ☐ Yes
☐ No (we will not be able to include you in this program)

Your Name: _____
 Your Title: _____
 Your Signature: _____

FAX THIS COMPLETED FORM BACK TO ACCESS HEALTH AT 919-303-3225

EXHIBIT B

RECEIVED 07/27/2020 04:30PM

Dear

We are contacting you from Access Health on behalf of our client, **KRAFT FOODS**, makers of new **CREATIVE ROOTS** plant-powered beverages for kids, to participate in a **FREE** sampling program at your pediatric practice / facility. Pediatrician practice and clinic response was so overwhelmingly positive that our 160,000 samples were all allocated last week for the initial program, but based on this enthusiasm and another round of 160,000 samples. We have room remaining for approximately 100 more pediatric practices / facilities, so if you want to be included, please **OPT-IN** by **Friday, July 31, 2020** (final product allocated on a first-come-first-serve basis).

According to the **American Journal of Public Health** and the **Harvard School of Public Health**, **1 in 2 kids is underhydrated.**¹ With an expected record-breaking hot August and kids going back to school (or studying remotely), moms will love **CREATIVE ROOTS** to give their kids the **plant-powered hydration they need with only 1g of sugar, clinically shown to increase hydration levels in children.**² Samples are actual kid-sized 8.5 oz. plastic mini-bottles.

You may remember us, CoOptions Health & Wellness, from our multiple Disney gummy vitamins promotions in the past and we hope to have you opt into this new program below. In Early August, we will be shipping the following to each participating office **at absolutely NO COST**:

- Minimum of three small cartons (108 total samples in a variety of flavors), up to 12 cartons (432 samples).
- A counter sign with a 50 sheet tear pad to invite parents to share their product opinion in an opt-in online survey (for a \$10 Amazon eGift card thank you reward), plus a \$2.00 coupon on the back of the tear sheet.

We will send a second shipment of a minimum of 108 samples (up to 432 samples) two weeks after the first shipment, knowing that space is often limited at facilities. Prior to shipping, we are following strict packing and product handling safety protocols.

If you would like your practice / facility to participate in this program, simply **VISIT** our opt-in portal at www.CreativeRootsOptin.com OR complete and FAX back this form to 919-303-3225 (no cover sheet required). Please respond by **FRIDAY, July 31st**, but we recommend earlier to ensure that sample allocations are still available.

As with all our free **ACCESS HEALTH** sampling programs, **these promotions are funded 100% by our clients and provided to physicians around the country at no cost and without other obligations.** Kraft Foods' purpose in providing this program to you is to get the word out on Creative Roots and provide parents and their kids with a chance to try them. Should you have any questions about the program, please feel free to contact me at (919) 303-3223 ext. 402 (Brian Sockin's VM) or blanger@cooptions.com.

Best Regards,

Brad Langer, Program Manager

¹ Harvard School of Public Health article: <https://www.hsph.harvard.edu/news/press-releases/study-finds-inadequate-hydration-among-u-s-children/>, Kenney E, et al. Prevalence of Inadequate Hydration Among US Children and Disparities by Gender and Race/Ethnicity: National Health and Nutrition Examination Survey, 2009-2012. *Am J Public Health*. 2015;105:e113-e118. ² Dr. Douglas Casa, "Nutrition, Urinary Markers and Sleep Habits in Children"

RECEIVED 07/27/2020 04:30PM

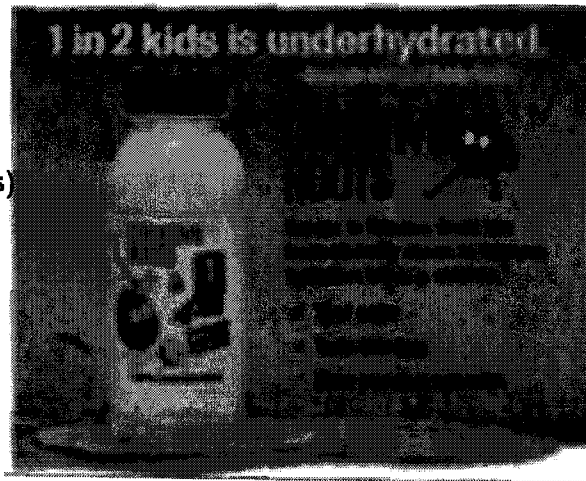


- ☐ **YES!** Please send me the free samples
☐ **NO**, please do not ship me the free samples

By completing this form, you will receive the following Creative Roots **FREE** product samples and signage:

- 3 to 12 small cartons (108 to 432 samples) in mid-August and again in late August (216 to 864 total samples), choose below
- 1 Counter sign per case per shipment with 50 tear pad with \$2.00 coupon

Please choose the number of samples that you would like to request below (please Select one of the following):



- ☐ Please ship 3 Cartons X 2 shipments (216 total samples)
☐ Please ship 6 Cartons X 2 shipments (432 total samples)
☐ Please ship 9 Cartons X 2 shipments (648 total samples)
☐ Please ship 12 Cartons X 2 shipments (864 total samples)

Receiving Contact Name: _____
 Practice / Facility: _____
 Street Address (NO PO BOXES): _____
 Floor, Building, Suite, etc. (if applicable): _____
 City/Town: _____
 State: _____
 Zip: _____

I agree on behalf of my facility to only distribute samples to parents and adult caretakers.

- ☐ Yes
☐ No (we will not be able to include you in this program)

Your Name: _____
 Your Title: _____
 Your Signature: _____

FAX THIS COMPLETED FORM BACK TO ACCESS HEALTH AT 919-303-3225

EXHIBIT C



[Home](#) | [Products▼](#) | [About Us](#) | [The Sploots](#) | [Hydration](#)



FAQ

Why should I serve Creative Roots and not juice?

Creative Roots is a plant-powered beverage with the hydration kids need and delicious fruit flavors they love. With 1 gram of sugar and all-natural ingredients, you can feel great about serving your kids Creative Roots.

Is Creative Roots a better-for-you beverage?

Yes! Creative Roots includes all-natural and plant-powered ingredients with 1 gram of sugar to provide a

better-for-you and delicious beverage for kids.

Will Creative Roots keep my kids hydrated? Why is that important?

Yes! Creative Roots plays a key role in keeping kids hydrated. Being well-hydrated is crucial to maintaining a healthy body and mind!

How do I know if my kid is hydrated?

An easy test is by checking the color of their pee. If your child's pee is dark yellow, they are likely underhydrated. A transparent color indicates proper hydration.

How many Creative Roots flavors are there?

Creative Roots comes in four kid-approved, low-sugar flavors – all with 1 gram of sugar: Watermelon Lemonade, Peach Mango, Orange Pineapple, Mixed Berry.

Still have more questions?

Fill out this form and we will get back to you!

Age Range



First Name

Last Name

Email

Address

City

State



Zip Code

Country

United States

Phone Number

Subject

Submit

Cancel

CONTACT
INFORMATION

INFORMATION

Creative Roots

Consumer Relations

801 Waukegan Road

Glenview, IL 60025



[CONTACT US](#) | [TERMS OF USE](#) | [PRIVACY POLICY](#)

DO NOT SELL MY PERSONAL INFORMATION

© Kraft Foods Group Brands LLC. All Rights Reserved.

Trust
INTegrity & TRUST

EXHIBIT D

[Target](#) / [Grocery](#) / [Beverages](#) / [Water](#)

Creative Roots Mixed Berry Enhanced Water - 4pk/8.5 fl oz Pods

[Shop all Creative Roots Beverage](#)



\$3.19

★★★★★ 386 ✓



\$3 with same-day order services

Order Pickup or Same Day Delivery • [Details](#)

Quantity

1



Not sold at **Chicago State St.**

Pick up at Chicago South Loop

[Check other stores](#)

Ready within 2 hours for pickup inside the store.

Same Day Delivery to 60603

[Edit zip code](#)

Get it as soon as 6pm today with Shipt

Pick up here

Deliver it

Free with membership or \$9.99/order

[Learn more](#)

This item isn't available for shipping.



Add to registry

[Help us improve this page](#)

About this item

Details

Label info

Shipping & Returns

Q&A

Highlights

- One 4 ct. package of Creative Roots Mixed Berry Flavored Coconut Water Kids Beverage with other natural flavors
- Made with all natural ingredients and 1 g of sugar per serving. The sugar in Creative Roots is naturally occurring sugar from coconut water
- Plant-powered hydration kids need
- Flavored coconut water taste kids love
- Each bottle of kids coconut water beverage fits into school lunch bags easily
- Perfect for your child's lunch or on the go with a snack

• This coconut water beverage contains 100% natural, non-sweetened

Show more

More to consider

\$3.19

Creative Roots Waterm...

\$3.79

Creative Roots Peach ...

\$3.99

Nestle Pure Life Purifie...

\$0.99

Purified Water - 1g

Similar items

\$3.19 Creative Roots Waterm...
 \$3.79 Creative Roots Peach ...
 \$2.49 B1U Watermelon Cucu...
 \$2.49 B1U Lemon Cham

Guest Ratings & Reviews

4.7

97



386 star ratings

97% would recommend

74 recommendations

| | |
|---------|-----|
| 5 stars | 76% |
| 4 stars | 18% |
| 3 stars | 4% |
| 2 stars | 1% |
| 1 star | 1% |

4.8

Quality
out of 5

4.7

Taste
out of 5

4.7

Value
out of 5

Prices, promotions, styles and availability may vary by store & online. See our [price match guarantee](#). [See how a store is chosen for you.](#)

Sponsored

waterdrop® | Drink More Water - Add Taste & Vitamins Not Sugar**(Ad)** https://www.waterdrop.com/drink_water/start_today ▼

1 cube can change your drinking behaviour forever. Discover the waterdrop® innovation! 6,000+ reviews online. Over 500,000 satisfied customers. Discover waterdrop® today! Wide Selection of Bottles. Limited Edition Bottles. Fantastic Taste. Discover our Microdrinks. 1,000,000 Happy Customers. Natural Ingredients. Additional Discounts. Exclusive Sets. Quick delivery. Without Sugar.
rating for waterdrop.com

[→ Visit Website](#)

***See offer details.** Restrictions apply. Pricing, promotions and availability may vary by location and at Target.com.

[Help](#) ▼[Stores](#) ▼[Apps](#) ▼[Social](#) ▼[More](#) ▼

The latest on our store health and safety plans

[Recalls](#) [Terms](#) [Interest-Based Ads](#) [CA Privacy Rights](#) [CA Supply Chain Act](#) [Privacy](#)**Do Not Sell My Personal Information - CA Resident Only**

™ & © 2021 Target Brands, Inc.

**Expect More. Pay Less.**

